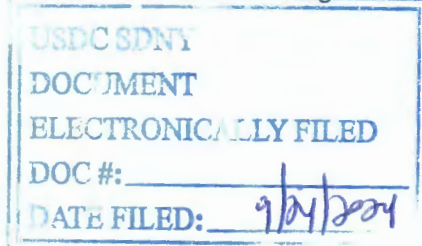


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

VALLAIR SOLUTIONS, SARL,

*Plaintiff and Counterclaim  
Defendant,*

v.

321 PRECISION CONVERSIONS, LLC,

*Defendant and Counterclaim  
Plaintiff.*

NO. 1:21-cv-07507-CM-RWL

JUDGE COLLEEN MCMAHON

**DEFENDANT 321 PRECISION  
CONVERSIONS, LLC AND PLAINTIFF  
VALLAIR SOLUTION SARL'S JOINT  
MOTION TO SEAL OR REDACT**

Defendant 321 Precision Conversions, LLC ("Precision"), with the consent and agreement of Plaintiff Vallair Solution SARL ("Vallair"), respectfully moves this Court for leave to file certain documents under seal or in redacted form, to protect Confidential Information as contemplated in the parties' Confidentiality Agreement and Stipulated Protective Order (Doc. 37), including documents previously designated by a party as "Confidential" or "Confidential Attorneys' Eyes Only." A memorandum of law is jointly submitted by both parties in support of this motion.

MEMO ENDORSED

Dated: April 29, 2024

Respectfully submitted,

/s/ Chelsea MikulaChelsea Mikula (admitted *pro hac vice*)Smita Gautam (admitted *pro hac vice*)Lindsey E. Sacher (admitted *pro hac vice*)

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9/24/2024  
This motion is granted temporarily, and none pro tunc to April 30, 2024, so that the parties may file certain redacted documents CONFIDENTIAL but redacted pendente lite. Hard copies with no redactions must be delivered to chambers immediately. When a decision is reached on the underlying motion the parties will have 10 days to explain why anything in that decision should remain "Confidential." *LM*

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*Attorneys for Defendant 321 Precision  
Conversions LLC*

Consented and agreed to on this 29<sup>th</sup> day of  
April, 2024, by:

By: /s/ Evan Kwart with express  
permission

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and

THE AXELROD FIRM, PC  
By: /s/ Debora A. O'Neill with  
express permission

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**PROOF OF SERVICE**

A copy of the foregoing was served on April 29, 2024 by sending it by electronic means to the email addresses provided by the parties as follows:

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*Attorneys for Plaintiff Vallair Solutions SARL*

Dated: April 29, 2024

Respectfully submitted.

/s/ Chelsea Mikula

Chelsea Mikula (admitted *pro hac vice*)

*One of the Attorneys for Defendant 321 Precision  
Conversions LLC*